

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CENTURY INDEMNITY COMPANY, as successor to Insurance Company of North America; ACE PROPERTY & CASUALTY INSURANCE COMPANY (f/k/a CIGNA Property & Casualty Insurance Company), as successor-in-interest to Central National Insurance Company of Omaha, but only as respects policies issued by it through Cravens, Dargan & Company, Pacific Coast; and PACIFIC EMPLOYERS INSURANCE COMPANY,

Plaintiffs,

07 CV 10712 (VM)
(ECF)

vs.

TRANSATLANTIC REINSURANCE COMPANY,

**MOTION TO ADMIT
MARK A. KREGER
PRO HAC VICE**

Defendant.

PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York, I, R. James DeRose, III, a member in good standing of the bar of this Court, hereby move for an Order allowing admission pro hac vice of

Mark A. Kreger
Locke Lord Bissell & Liddell LLP
111 South Wacker Drive
Chicago, Illinois 60606
Phone Number: (312) 443-0700
Fax Number: (312) 443-0336

Mark A. Kreger is a member in good standing of the Bar of the State of Illinois.

There are no pending disciplinary proceedings against Mr. Kreger in any State or Federal Court.

642497 #25 2-20-08 2164
FEB 22 2008 S.D. OF N.Y.
U.S. DISTRICT COURT
CLERK'S OFFICE

Dated: February 15, 2008
State: New York, New York

Respectfully submitted,



R. James DeRose, III (RD 9660)
Locke Lord Bissell & Liddell LLP
885 Third Avenue, 26th Floor
New York, New York 10022
Ph: (212) 812-8329
Fax: (212) 812-8379

NYC 64555v.1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CENTURY INDEMNITY COMPANY, as successor to Insurance Company of North America; ACE PROPERTY & CASUALTY INSURANCE COMPANY (f/k/a CIGNA Property & Casualty Insurance Company), as successor-in-interest to Central National Insurance Company of Omaha, but only as respects policies issued by it through Cravens, Dargan & Company, Pacific Coast; and PACIFIC EMPLOYERS INSURANCE COMPANY,

Plaintiffs,

07 CV 10712 (VM)
(ECF)

vs.

TRANSATLANTIC REINSURANCE COMPANY,

Defendant.

**AFFIDAVIT OF
R. JAMES DEROSSE III
IN SUPPORT OF MOTION
TO ADMIT MARK A.
KREGER PRO HAC VICE**

State of New York)
) ss.:
County of New York)

R. James DeRose, III, being duly sworn, hereby deposes and says:

1. I am an associate at Locke Lord Bissell & Liddell LLP, counsel for Defendant Transatlantic Reinsurance Company ("Transatlantic") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Mark A. Kreger as counsel pro hac vice to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on June 7, 2004. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Mark A. Kreger since 2003.
4. Mr. Kreger is a partner at Locke Lord Bissell & Liddell LLP in Chicago, Illinois.
5. I have found Mr. Kreger to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Mark A. Kreger, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Mark A. Kreger, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Mark A. Kreger, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: February 15, 2008

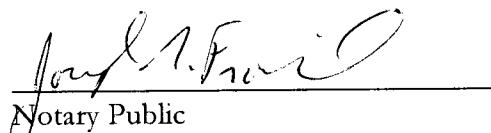
State: New York, New York

Respectfully submitted,



R. James DeRose, III (RD 9660)

Sworn to before me this 15th
day of February, 2008.



Notary Public

JOSEPH N. FROEHЛИCH
Notary Public, State of New York
No. 02FR6002500
Qualified in Suffolk County
Commission Expires February 9, 2010

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CENTURY INDEMNITY COMPANY, as successor to Insurance Company of North America; ACE PROPERTY & CASUALTY INSURANCE COMPANY (f/k/a CIGNA Property & Casualty Insurance Company), as successor-in-interest to Central National Insurance Company of Omaha, but only as respects policies issued by it through Cravens, Dargan & Company, Pacific Coast; and PACIFIC EMPLOYERS INSURANCE COMPANY,

Plaintiffs,

07 CV 10712 (VM)
(ECF)

vs.

TRANSATLANTIC REINSURANCE COMPANY,

**ORDER FOR ADMISSION
PRO HAC VICE ON
WRITTEN MOTION**

Defendant.

Upon the motion of R. James DeRose, III attorney for Defendant Transatlantic Reinsurance Company, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Mark A. Kreger
Locke Lord Bissell & Liddell LLP
111 South Wacker Drive
Chicago, Illinois 60606
Phone Number: (312) 443-0700
Fax Number: (312) 443-0336
Email Address: mkreger@lockelord.com

is admitted to practice pro hac vice as counsel for Defendant Transatlantic Reinsurance Company in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the

Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: February __, 2008
New York, New York

United States District/Magistrate Judge

NYC 64557v.1

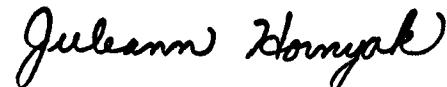
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Mark Alan Kreger

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on October 29, 1980 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto placed my hand and affixed the seal of said Supreme Court, at Springfield, in said State, this Tuesday, January 29, 2008.



Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CENTURY INDEMNITY COMPANY, as successor :
to Insurance Company of North America; ACE :
PROPERTY & CASUALTY INSURANCE :
COMPANY (f/k/a CIGNA Property & Casualty :
Insurance Company), as successor-in-interest to :
Central National Insurance Company of Omaha, but :
only as respects policies issued by it through Cravens, :
Dargan & Company, Pacific Coast; and PACIFIC :
EMPLOYERS INSURANCE COMPANY, :

Plaintiffs, : **AFFIDAVIT OF MARK A. KREGER**
vs. : **IN SUPPORT OF MOTION FOR**
vs. : **ADMISSION *PRO HAC VICE***
vs. :
TRANSATLANTIC REINSURANCE COMPANY, :
Defendant. :

STATE OF ILLINOIS)
)
) ss:
COUNTY OF COOK)

MARK A. KREGER, being duly sworn, deposes and states:

1. I am a partner in the law firm of Locke Lord Bissell & Liddell, LLP, counsel to Defendant Transatlantic Reinsurance Company (“Transatlantic”) in this matter. I submit this affidavit in support of my application to this Court for an order permitting me to appear as counsel *pro hac vice* on behalf of Transatlantic for the purposes of this action.

2. This affidavit is submitted pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York in support of the instant application for admission *pro hac vice* to the Southern District

Court of New York for the purpose of representing Transatlantic in the above-captioned matter.

3. Locke Lord Bissell & Liddell, LLP has an attorney-client relationship with Transatlantic. Defendant requested that KIMBERLY M. HAMM, Esq. and I represent it in this matter.

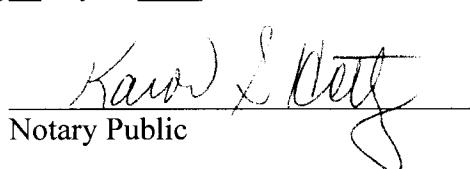
4. I am a practicing attorney and member in good standing of the bar of the State of Illinois (attached is a certificate of good standing from the Supreme Court of Illinois). Moreover, there have never been any disciplinary proceedings or criminal charges filed against me in any jurisdiction.

5. My office address, telephone number and facsimile number are included below my signature.

By:


Mark A. Kreger
111 South Wacker Drive
Chicago, IL 60606
Telephone (312) 443-0700
Facsimile (312) 443-0336

Sworn to before me this
13th day of Feb. 2008


Notary Public



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CENTURY INDEMNITY COMPANY, as successor to Insurance Company of North America; ACE PROPERTY & CASUALTY INSURANCE COMPANY (f/k/a CIGNA Property & Casualty Insurance Company), as successor-in-interest to Central National Insurance Company of Omaha, but only as respects policies issued by it through Cravens, Dargan & Company, Pacific Coast; and PACIFIC EMPLOYERS INSURANCE COMPANY,

Plaintiffs,

07 CV 10712 (VM)
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vs.

TRANSATLANTIC REINSURANCE COMPANY,

Defendant.

CERTIFICATE OF SERVICE

STATE OF NEW YORK)
SS.:
COUNTY OF NEW YORK)

I, Gerry M. O'Leary, being duly sworn, deposes and says:

I am not a party to the within action, I am over 18 years of age, and am a Paralegal for attorneys, LOCKE LORD BISSELL & LIDDELL LLP, attorneys for the Defendants in the above-captioned action.

I certify and declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that on February 19, 2008, I served a copy of MOTION TO ADMIT MARK A. KREGER PRO HAC VICE, AFFIDAVIT OF R. JAMES DEROSSE, III, IN SUPPORT OF MOTION TO ADMIT MARK A. KREGER PRO HAC VICE (which attaches [PROPOSED] ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION) and AFFIDAVIT OF MARK A. KREGER IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE upon:

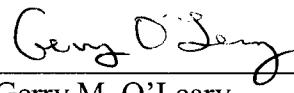
Frank Michael Esposito, Esq.
Crowell & Moring LLP (New York)
153 East 53rd Street, 31st Floor
New York, NY 10022
(212) 223-4000

Fax: (212) 223-4134
Email: fesposito@crowell.com

by personally handing the copy to a representative of said counsel, namely a Ms. Aeria, who was working as the 31st Floor receptionist.

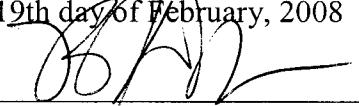
I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
February 19, 2008



Gerry M. O'Leary
Paralegal
Locke Lord Bissell &
Liddell LLP
885 Third Avenue
New York, New York 10022
(212) 812-8330

SWORN TO BEFORE ME THIS
19th day of February, 2008



R. James DeRose, III

R. JAMES DE ROSE, III, ESQ.
Notary Public, State of New York
No. 02DE6144289
Qualified in Bronx County
Commission Expires April 24, 2010